

UNITED STATES DISTRICT COURT  
for the

Southern District of Illinois

LaMonte R Young sr Plaintiff(s)  
Progressive Treatment Solutions Defendant(s)

Case Number:

3:22-cv-229-JPG  
(To be supplied by Clerk's Office)

**EMPLOYMENT**  
**DISCRIMINATION COMPLAINT**

Plaintiff brings a complaint against Progressive Treatment Solutions [defendant(s)] for discrimination as set forth below.

Plaintiff  DOES  DOES NOT demand a jury trial.

**I. PARTIES**

Name and Address of Plaintiff:

LaMonte R Young Sr  
219 ST John Dr  
Cattokia, IL 62206

Name and Address of Defendant(s):

Progressive Treatment Solutions (PTS)  
306 River Park Dr.  
East St. Louis, IL 62201

The plaintiff was:

- denied employment by the defendant(s).
- hired and is still employed by the defendant(s).
- employed but is no longer employed by the defendant(s).

The alleged discrimination began on or about: May 17, 2021 (give month, day, and year).

## II. JURISDICTION

1. Jurisdiction over this claim is based on 28 U.S.C. § 1331. Plaintiff alleges that the defendant(s) discriminated against Plaintiff because of Plaintiff's:

- Sex (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5)
- Race (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5, and/or 42 U.S.C. § 1981)
- Age (The Age Discrimination in Employment Act, 29 U.S.C. § 621)
- Disability (The Americans with Disabilities Act, 42 U.S.C. § 12101 and/or The Rehabilitation Act, 29 U.S.C. § 701)
- National Origin (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5)
- Religion (Title VII of the Civil Rights Act of 1967, as amended, 42 U.S.C. § 2000e-5)
- Other (list): Employment, Retaliation, Wrongful termination

2. Plaintiff  Has  Has Not filed a charge before the United States Equal Employment Opportunity Commission (EEOC) relating to this claim of employment discrimination. [Attach a copy of charge to this complaint].

Plaintiff  Has  Has Not filed a charge before the Illinois Department of Human Rights relating to this claim of employment discrimination. [Attach a copy of charge to this complaint].

3. Plaintiff's Right to Sue Notice from the EEOC was received on or about 11/17/2021 (date). [Attach a copy of Notice of Right to Sue to this complaint].

### III. STATEMENT OF LEGAL CLAIM

Plaintiff is entitled to relief in this action because:

I was wrongfully terminated from my job @ PTS. Their was no just cause to fire me. Due to my Job loss, I can't pay my bills, pay my child support, Provide for myself, I lost my insurance benefits, etc Emotional stress & humiliations.

### IV. FACTS IN SUPPORT OF CLAIM

State here briefly and clearly as possible the essential facts of your claim. Take time to organize your statement. You may use numbered paragraphs if you find it helpful. Describe precisely how each defendant in this action is involved. Give dates and places. Concentrate on describing as clearly and simply as possible the employment practice you allege to be illegal and how it discriminated against you. It is not necessary to make legal arguments or cite any cases or statutes. In most circumstances, this only makes your claim difficult to understand. As much as possible, let the facts speak for themselves.

On May 15, 2021 a mandatory meeting was held by my supervisor Patrick Jackson. The meeting was very chaotic because My supervisor told everyone that they were free to curse & call out names if they chose to. I was shocked. During this meeting there was, cursing & name calling toward me, by other employees regarding claims that were rumored but not fact. This meeting was suppose to clear up things but due to the unruly co-workers & a unprofessional supervisor (Patrick Jackson) nothing was accomplished. I attempted to reach out to the GM (Andy Halencalk) to discuss what happened at the meeting. I called, no answer, then I texted him with no response. On May 16<sup>th</sup> Mr. Jackson was made aware of my attempts to contact the GM. He was not happy so I went to work Monday.

When I returned to work on May 17th Mr. Jackson fired me on the parking lot of PTS. His reason was that I violated his protocol by filing a complaint with HR or the GM. He told us we couldn't go to HR which I felt was wrong. I asked to speak to HR. He told me to leave or he would call the police on me. I was a dedicated worker, no write ups, no disciplinary actions. So this action was unfair & wrong. Another co-worker complained about an issue to HR & he was not terminated, but chose to go to another department to avoid losing his job. My going to HR or the General Manager to complain about what I was dealing with should NOT have cost me my job at all.

L Young Jr

**V. RELIEF YOU REQUEST**

Based on the foregoing, Plaintiff seeks the following relief: (check below what you want the court to do for you – make as many checks as you like, and use additional sheets, if necessary).

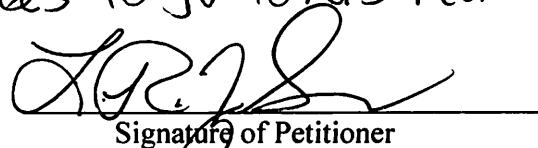


- An award of back pay
- Reinstatement to Plaintiff's old position
- Costs of suit (but not attorney fees)
- An award of money damages
- Other (explain below)

I would like Patrick Jackson to receive disciplinary actions, including termination if possible. So know one else will go through what I have. Mr. Jackson is very unprofessional. He creates a hostile work environment among his employees. He doesn't keep anything Confidential. He allows his employees to go to his home, drink & he plays favors.

Signed on: 2/3/2022  
(date)

219 ST John Dr  
Street Address  
Carrollton, IL 62206  
City, State, Zip

  
Signature of Petitioner

Lamonte R. Young Sr  
Printed Name

\_\_\_\_\_  
Signature of Attorney (if any)

**Facts in Support of Claim**

**February 3, 2022**

**On Saturday May 15, 2021, a mandatory meeting was held by my immediate supervisor (Patrick Jackson). The meeting was very chaotic because prior to the start of the meeting the Supervisor told everyone that they were free to curse and call out names if they chose to. During the meeting there was cursing and name calling, and threats toward me by other employees regarding rumors that were being said around the job that were not true. The meeting that I suggested that we have was supposed to clear up the false allegations being spread and the harassment I was dealing with by coworkers. But due to my fellow unruly coworkers and my unprofessional supervisor nothing was accomplished. So, I chose to attempt to reach out to the GM (Andy Halencak) on Sunday May 16<sup>th</sup> to discuss what happened at the meeting. I called him, no answer, then I texted him to call me with no response back. Apparently, Patrick Jackson was made aware of my reaching out to the GM. On Monday May 17<sup>th</sup> when I returned to work Patrick Jackson met me on the parking lot and told me that I was fired for reaching out to the General Manager. The reason he gave me was that I supposedly violated his protocol by trying to reach out to the GM. I wanted to talk to them regarding the hostile work environment that was created at the mandatory meeting. I then asked my supervisor (Patrick Jackson) could I speak to HR and he told me that I couldn't, I had to leave or he would call the police on me. I then left the premises. He didn't have me sign anything. He just fired me outside on the parking lot with no clear reasoning.**

**I was a very dedicated employee to Progressive Treatment Solutions. I had a clean record. No call offs, no write ups, no disciplinary actions against me. So, to me these actions of terminating me were unfair, wrongful, discriminatory & based on retaliation. There was another coworker that had issues & went to HR and was NOT terminated. So I want to understand why did I have to loose my job?**

**LaMonte R Young Sr.**